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May 14, 2021

**VIA ECF AND ELECTRONIC MAIL**

Hon. Analisa Torres  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *AmySue Salvatore v. v. Airbus Group HQ, Inc., et al*, (21-CV- 03487) (AT)

Hon. Judge Torres:

Pursuant to I. C of Your Honor's Individual Practices, the parties are jointly requesting an adjournment of the Initial Pretrial Conference currently scheduled for May 24, 2021 and the associated deadlines to file the parties' joint letter, Case Management Order, and Scheduling Order. *See* Dkt. 33. The parties respectfully propose that the Initial Pretrial Conference be continued for ninety (90) days until Monday, August 23, 2021, or alternatively, to a time the Court deems appropriate.

The parties have previously agreed to waive service of Defendant Airbus S.A.S. in exchange for sixty (60) days to file a responsive pleading and the dismissal of defendants Airbus SE and AVSA S.A.R.L. without prejudice. We believe that the most efficient use of judicial resources would be if the Initial Pretrial Conference was held after said responsive pleadings have been submitted. Additionally, the current date of the Initial Pretrial Conference conflicts with the maternity leave of Counsel of Record for Plaintiffs, Attorney Diane Nordbye. The parties believe this additional time is fair in light of Attorney Nordbye's impending maternity leave and the impending appearance of Defendant Airbus S.A.S.

The parties jointly request this extension; they have not made any prior requests for an extension of this deadline; and the requested extension would not affect any scheduled dates, case management plan, or scheduling order.

GRANTED. The initial pretrial conference scheduled for May 24, 2021, is ADJOURNED to **September 2, 2021**, at **10:40 a.m.** By **August 26, 2021**, the parties shall file their joint letter and proposed case management plan.

SO ORDERED.

Dated: May 20, 2021  
New York, New York

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ANALISA TORRES  
United States District Judge